

M/D 1

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

RECEIVED

2023 SEP -5 A 11:59

Brandon Howard

Full name and prison name of
Plaintiff(s)

v.

Chaplin M. Haubert

STATE OF ALABAMA

~~Commissioner HAM~~

Commissioner HAM

BTS/unbound.

Name of person(s) who violated your
constitutional rights. (List the names
of all the person.)

TREY GRANGER, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

CIVIL ACTION NO. 2:23-cv-521-ECM-JTA
(To be supplied by Clerk of U.S. District
Court)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES ☐ No ☒
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES ☐ NO ☒
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) _____

Defendant(s) _____

2. Court (if federal court, name the district; if state court, name the county)

3. Docket number _____
4. Name of judge to whom case was assigned _____
5. Disposition (for example: was the case dismissed? Was it appealed? Is it still pending ?) _____
6. Approximate date of filing lawsuit _____
7. Approximate date of disposition _____

II. PLACE OF PRESENT CONFINEMENT Bibb correction Facility

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED Bibb -
Correction Facility Chapel inside the Church

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

	NAME	ADDRESS
1.	<u>M. HAUBERT</u>	<u>565 Bibb Lane, Brent AL 35034</u>
2.	Commissioner HAM	565 Bibb Lane Brent AL 35034
3.	<u>State of ALABAMA</u>	<u>565 Bibb Lane Brent AL 35034</u>
4.	<u>Commissioner HAM</u>	<u>565 Bibb Lane Brent AL 35034</u>
5.	<u>BTS / UnBound</u>	<u>565 Bibb Lane Brent AL 35034</u>
6.	_____	_____

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED Wednesday
August 8th 2023

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Religion Discrimination / Racial Discrimination
Seperation of Church and State.

2

on Wednesday August 23rd At 12:30PM in front of the Chaple, the Head Chaplin of Bibb correctional Facility has once again canceled church. yesterday August 22nd At 1:00PM in front of the ICS office the chaplin canceled church call.

But when the Christian Base Programme called unBound / Jump Start, wants to have some Jesus time to themselves they can. every Programme here At Bibb Prison is ^{BH} ~~Prespe~~ Prespeterias. ^{BH} ~~Chaplin~~ Harbor they Allow one Belief. Petitioner applied For the core Programme and was excepted And three Months Later was Removed Base on treatment Failure, Base on inmates Lying. Petitioner Went to court with a Prisoner As Being As Judge. other ^{BH} ~~Religion~~ Religions Are Not Allow to take Jump Start / unBound Programme. Core has A Mandatory Class called Roundtable which is As quated in Roundtable Book. the counsilors met with ADA cordnater without Petitioner Present Before terminating me From Programme.

2

The "Freedom" of Religion a Fundamental Right one of the keystones established By constitutional Amendments, Strengthened By Law, And Protected By Courts through Precedent. State Prison officials Violate the constitution when there Action Promote, Advance, Reward or Privilege A Religion, the Practice of Religion or the Lack there of. Discrimination Based Action Are strictly prohibited. "Equal Protection" Lee VS Weisman 505 US 577 (1992) Programmes Base on specific Religion denomination Violate this Right. Religious Based Programme Recieve Packages, Special meals, special TV'S movies, And Air conditioned Rooms, special chairs. the Privileges Violate constitutional Rights. Life Link having Bible verses in Around table Book is unconstitutional. Programmes Recommended By Parole Board are control By other Prisoners who Act AS A Judge, Jury, unorthadox Beliefs Are Not tolerated. there No denying the FACT that Programmes Are Bible Base as Proven By airculem the special privileges these Programmes Recieved Also can not Be disputed.

3

the chaplin Refuses the Brother's who are Catholic to Attend Catholic Mass service in the Sanctuary. But the Brothers Are to have MASS in a study Room which is Really SMALL. This is Discrimination.

And what I don't understand about Christian Programmes, OR Programmes that has a Religion Stand-Point. When you have Muslim Brothers who wants to Be in these Christian Programs there Not Allow to Because there Not Christians. I AM NOT targeting Christian Belifes But the Discrimination that Violates a inmates Rights.

the Head Chaplin here At Bibb correction Facility is A Control Freak. and is a Hater of Religion ~~other~~ Rather then his own Personal Beliefs. He's Bias and have DEFAMATION of Character. He talk's against the Church of the Highlands, He will Not have church services for Population. He Needs to Be Fired.

(4)

on AUGUST 24 2023 12:30 PM

once again the Head Chaplin ^{BH} ~~Decide~~

Decided Not to call church call in the New Chaple. it has Been said By others around the Prison that there will Be no church Serves All this week OR Next week.

But Let the Chaplin Program want to have church /AKA Jumpstart/ unBound in the Chaple. the Chaplin will Brake his legs to Allow them of All inmates in the prison to go to Church. they EVEN have townhouse meetings in the Chaple which is Ban By (Lifelink) Core Programme.

Jumpstart Changed Program "Name" is Base on Specific Christian Beliefs And do not tolerate Any Argument, OR Any Prisoners of other Religions OR NONE can Be in the Prison unBound /programme ^{BH} ~~Revoke~~ Periode. ^{BH} ~~I want to~~ ^{BH} ~~this to~~

I will want this to Effect the whole State OF ALABAMA Prison System. ^{BH} ~~I~~ ^{BH} ~~do~~ want to understand that my Life in the Prison system is in danger And want to Be Place in Federal Custody. I Repeat to the courts My Life is in danger.

August/25th/2023

The Head Chaplin ^{M. Haubert} ~~Harbour~~, that is over the programme A.K.A Jumpstart/unBound. This has come to my understanding that Jumpstart/unBound is mostly full of A.B. & S.B. White gang Members Aryan Brotherhood / Southern Brotherhood come down and see for your self the chapel is yet even close today. these programmes has a limit of 3 years of completion Lifelink is two years of completions. TM is completion of 2-two years. P.T.W. Pathway to Freedom is 18 months on completion of Programme. General Population is over the Boiling Point of Running over. ^{BH} overcrowded Violate officers and inmates its crazy in this inside world. A Change Needs to come. I Say it once and will Say many more time to come I Fear For My Life as ^{BH} ~~an~~ An inmate in Bibb correction Facility it does Not Matter what State Prison I'm in Alabama system. I want to Be Place in a Federal holding Cell, until ^{BH} ~~After the~~ ^{BH} Before And After

6

On AUGUST 28th 2023 AT 2:00 AM
Moorish temple of America a Muslim Service
Was Put on hold due to a Mental Health Class
held By MS, Black CALLED ANGER management.

this is discrimination though they were having
class. Chaplin Haubert Refused to Let Any
other Religion into the church Besides Christians
this Aint Right. every other Religion is held on the
Visitation yard, And why is that?

Chaplin Haubert will Allow unBound B.T.S.
into the chapel Before He will Allow any other
Religion into the chapel. the Programs in F-Dorm
Needs to Be Shut down, this will solve many
Problems. officers Busted drugs and cell phones
in F-Dorm Programmes Majority of white guys
with child sex cases Live in this dorm.

the Chaplin Refuse to give other guys a chance
in his Holy Roller Program. and they have
Leadership that have not changed in over five years
that is discrimination against other members of
the Program to Be able to move up in position.

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

August 8th 2023 2:00PM in the church. Chaplin
M. Haubert, Religion Discrimination / Racial ^{BH} ~~Discrimination~~
Discrimination / Seperation of Church and state

GROUND TWO: Penboar vs Cinnanatti 475 us 469 (1986)

SUPPORTING FACTS:

GROUND THREE:

SUPPORTING FACTS:

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Punitive Damages ASK For AS Punishment of My
Constitution Being Violated. I want chaplin M. Haubert
to Be Fired / I want Jump start / unbound to Be
Close down. Federal Protective custody of this case
I WANT All Programmes to Be Free For All Religions in the
STATE OF ALABAMA

Brandon Howard
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

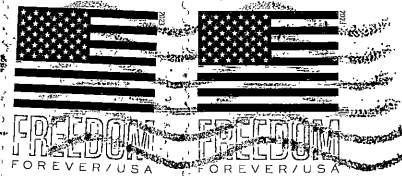
Executed on 9-1-2023
(Date)

Brandon Howard
Signature of plaintiff(s)

BRANDON HOWARD
A/S 229852-C1-29A
Bibb Correctional Facility
565 Bibb Lane
Brent, AL 35034

BIRMINGHAM AL 350

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United States District Court
Middle District of ALABAMA
One Church Street,
Montgomery, AL 36104

Legal mail

36104-401801

